

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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Layla Fakhr El-Din El-Sawy and  
Egyptian European Pharmaceutical  
Industry, an Egyptian corporation,

Plaintiff,

Case No.2:20-cv-13409-LJM-KGA  
District Court Judge Laurie J. Michelson  
Magistrate Judge Kimberly G. Altman

vs.

Regents of the University of Michigan,  
a non-profit educational institution of the  
State of Michigan, and Mark L. Day,

Defendants.

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**JOINT MOTION TO EXTEND SCHEDULING ORDER**

Plaintiffs Layla Fakhr El-Din El-Sawy ("El-Sawy") and Egyptian European  
Pharmaceutical Industry ("EEPI") and Defendant Mark Day ("Day") file their Joint  
Motion to Extend Scheduling Order and state in support:

1. The most recent Order of the Court on March 14, 2023, extended the due date for filing Motions for Summary Judgment to May 15, 2023. The parties have completed discovery and have entered into and conducted serious settlement negotiations for all claims of all parties.

2. The parties have exchanged several proposals but due to the international aspect of the case and the fact that all of the plaintiff representatives are overseas, it has taken significantly longer to respond to the exchanged proposals than the parties originally anticipated. There is the added complexity that the settlement may require the consent of a non-party, The University of Michigan, to be fully effective.

3. The settlement negotiations involve proposals for continuing work by the parties after an agreement is reached, and the details of any such work are reasonably complex and will require some time to work through.

4. The parties prefer to expend the time and effort into settlement negotiations at this time instead of filing and responding to lengthy summary judgment motions as to the claims of both plaintiffs.

5. The parties believe that an extension of the date for filing dispositive motions would need to be extended to **July 7, 2023**.

6. There are no dates presently set for any pretrial orders, pretrial conferences, Motions in Limine, or for the jury trial.

7. The extension sought does not prejudice any party.

Wherefore, the parties jointly request that the Court extend the date for filing dispositive motion to **July 7, 2023**.

Dated: May 5, 2023

Respectfully submitted,

/s/ Kevin F. O'Shea

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### **PROOF OF SERVICE**

The undersigned certifies that a copy of the above document was served upon the attorney(s) of record of all the party(ies) in this action by serving same at the business address(es) as disclosed by the pleading of record herein on May 5, 2023, by

\_\_\_\_ U.S. Mail  
\_\_\_\_ Hand Delivery  
\_\_\_\_ Electronic Mail

\_\_\_\_ Facsimile  
\_\_\_\_ Overnight Mail  
\_\_\_\_ X Electronic Filing

/s/ Thomas Bourque  
Thomas Bourque